

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACK TUCHTEN WHOLESALE PRODUCE, INC.

Plaintiff

v.

RONALD ERIKS d/b/a VILLAGE FARM STAND,
and KHALED ALSHAIKH d/b/a
VILLAGE FARM STAND, INC.

Defendants

AUSTER ACQUISITIONS LLC a/t/a
The Auster Company, Inc.,

Intervening Plaintiff

v.

RONALD ERIKS d/b/a VILLAGE FARM STAND,
and KHALED ALSHAIKH d/b/a
VILLAGE FARM STAND, INC.

Defendants

Case No. 09-7953
Hon. William J. Hibbler

RENEWED MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff, Jack Tuchten Wholesale Produce, Inc. ("Tuchten"), and Intervening Plaintiff, Auster Acquisitions, LLC a/t/a The Auster Company, Inc. ("Auster"), by and through their undersigned counsel, renew their Motion to enter a Consent Judgment against Defendant, Khaled Alshaikh d/b/a Village Farm Stand, Inc. pursuant to the Stipulation and Order previously entered herein. As grounds for this Renewed Motion, Tuchten and Auster submit that

notwithstanding the admonishment of the Court on July 1, 2010, Defendant has failed to make any payments to Tuchten or to Auster following the July 1, 2010 hearing despite agreeing to do so. In support thereof, Plaintiff and Intervening Plaintiff respectfully refer the Court to the Memorandum in Support and the Declarations of Dawn E. Arkin, Mary Rojas, and Mary Jean Fassett, filed herewith.

WHEREFORE, Jack Tuchten Wholesale Produce, Inc. and Auster Acquisitions, LLC a/t/a The Auster Company, Inc. request that their Renewed Motion for Entry of Consent Judgment be granted, and for such other and further relief as the Court deems necessary and proper.

Dated this 3rd day of September, 2010.

LAW OFFICES OF WILLIAM B. KOHN

McCARRON & DIESS

/s/ William B. Kohn

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/s/ Mary Jean Fassett

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Counsel for Plaintiff and
Intervening Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Renewed Motion for Entry of Consent Judgment was mailed, via first-class mail, postage prepaid, this 3rd day of September, 2010, to the following:

Khaled Alshaikh d/b/a Village Farm Stand Inc.
10443 S. 84th Avenue
Palos Hills, IL 60465

/s/ Mary Jean Fassett
Mary Jean Fassett